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Hon. Lewis J. Liman
United States District Judge
500 Pearl Street
New York, NY 10007

Re: United States v. Wander Rivera
24 Cr 417 (LJL)

Dear Judge Liman:

I am defense counsel for Wander Rivera, who is scheduled to be sentenced on April 24, 2025. At the time of the guilty plea, Your Honor granted my application to delay his Presentence Interview (“PSI”) because Mr. Rivera is scheduled to select a jury on May 27, 2025, in a federal criminal case in the Southern District of New York, United States v. Wander Rivera, 23 Cr. 203 (JHR).

I visited Mr. Rivera at MDC Brooklyn yesterday, and no disposition has been reached yet in relation to the upcoming trial. I respectfully request that the PSI in the instant case be adjourned for another sixty days. To cooperate fully and openly with the U.S. Probation Department during the PSI, Mr. Rivera would have to disclose facts that could potentially adversely affect his right to remain silent in relation to his upcoming trial. I would advise Your Honor immediately if a disposition were reached in the pending trial case.

AUSA Frank Balsamello informs me that he has no objection to this application.

Sincerely,

/s/

Donald J. Yannella, Esq.